

# Speak Up and Non-Retaliation Policy

## Johnson Controls Compliance Policy



### Applicability<sup>1</sup>

Corporate .....	Yes
U.S. divisions and majority-owned subsidiaries.....	Yes
Non-U.S. divisions and majority-owned subsidiaries .....	Yes
Consolidated joint ventures and affiliates .....	Yes
Unconsolidated joint venture affiliates .....	Recommended

At Johnson Controls, we are committed to putting our values first and doing business ethically. A strong culture of integrity empowers employees to do the right thing and to communicate openly about their concerns.

**Note:**

1. In addition to this Policy, certain Johnson Controls subsidiaries, joint ventures and affiliates in certain countries have specific whistleblowing policies applicable to those entities. These policies can be found [here](#).

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## Purpose

The Johnson Controls Speak Up and Non-retaliation Policy<sup>2</sup> provides guidance to employees on reporting concerns about violations of the Code of Ethics, Company policies, or the law. It also reinforces the Johnson Controls expectation of strict non-retaliation.

## Why is speaking up important?

Companies with strong cultures of integrity outperform their peers, are better places to work, and positively impact their communities. At Johnson Controls, we value an environment where everyone is empowered to question any possible wrongdoing. It is our responsibility to speak up if we suspect or observe misconduct as this allows us to resolve problems in a timely manner and prevent them from recurring.

## Who can speak up?

Anyone who is concerned about potential violations of the [Johnson Controls Code of Ethics](#), Company policy, or the law is encouraged to speak up. This includes current and former employees, interns, temporary workers, job applicants, suppliers, customers, and other third parties.

## How can I speak up?

There are several ways to raise your concerns:

- Discuss the issue with your supervisor or with another supervisor or manager you trust;
- Contact a member of the [Compliance](#), Human Resources, or Legal team;
- Contact an [Integrity Champion](#);
- Contact Johnson Controls' 24-hour [Integrity Helpline](#) – either online or through a dedicated local phone number (available on the website). The Integrity Helpline is operated by an independent, third-party service provider in multiple languages.

### Integrity Champions

strengthen our culture of integrity and support employees in raising concerns. They are local resources who are appointed and trained by the Compliance team.

### Scenario

**I am a Johnson Controls employee and I have a concern that I want to log into the Integrity Helpline. Do I need to talk to my manager or Human Resources first?**

You can report your concern directly into the [Integrity Helpline](#), without having to raise it to your manager or Human Resources. There is no single prescribed channel or hierarchy to follow for reporting concerns.

### Note:

2. This Policy serves as our Company's whistleblowing policy. This Policy broadly applies across Johnson Controls, but where local laws or regulations are stricter than this Policy, they prevail. For questions about specific laws and regulations related to whistleblowing, please email [AskCompliance@jci.com](mailto:AskCompliance@jci.com).

Fig 1

## Which concerns are mandatory to report into the Integrity Helpline?



**Bribery and Corruption**  
Making improper payments, receiving improper payments etc.

**Violations of Laws**  
Fair Competition, Data Privacy, Trade Compliance etc.

**Falsifying Documents or Records**  
Timesheets, expenses, signatures etc.

**Financial Statement Fraud**  
Manipulation or falsification of financial records, overstatement of revenue etc.

**Theft or Misuse of Assets**  
Expense fraud, theft of equipment, personal use of equipment etc.

**Conflicts of Interest**

**Discrimination**  
Race, ethnicity, gender, disability, age, religion, national origin, marital status, sexual orientation or any other characteristic protected by law

**Workplace / Threats of Violence or Possession of Weapons**  
(Emergency actions first)

**Alcohol or Substance Abuse**

**Workplace Bullying & Harassment**

**Retaliation**

**Not sure if a concern must be logged?**  
Email: [AskCompliance@jci.com](mailto:AskCompliance@jci.com)

Anyone who is aware of one of the concerns shown in Figure 1 should escalate or log it in to the Integrity Helpline. Managers, HR, Compliance, Legal have a responsibility to ensure that the concern is logged into the [Integrity Helpline](#). You may never independently decide that an investigation into one of these types of concerns is not required, nor may you conduct the investigation yourself or instruct someone to investigate.



## Can I speak up anonymously?

You have the option to remain anonymous when you report a concern into the [Integrity Helpline](#). If you choose to report anonymously, the investigator assigned to your case can still communicate with you via the helpline portal. We encourage you to check on your case periodically, as communicating with the investigator will help them conduct a thorough investigation into your concern.

## What if I don't have all the facts?

It is ok if you do not have all the facts. Just tell us what you know, and we will investigate. Do not try to investigate or gather more evidence on your own. Report concerns and respond to follow-up questions promptly so that we can prevent the situation from getting worse.

## What happens after a concern is reported into the Integrity Helpline?



**A concern is reported into the [Integrity Helpline](#)**



**The case is assigned to the appropriate investigation team**

Depending on the nature of the concern it may be assigned to Forensics, Human Resources, Enterprise Security, or a member of the Legal or Compliance teams.

**The assigned investigator reviews your case and conducts an investigation**



You, or the person who logged the concern on your behalf, can communicate directly with the assigned investigator within the Integrity Helpline tool



**Appropriate disciplinary and remediation actions are implemented and tracked**



**Once the investigation is completed, compliance works with management and other stakeholders to develop a remediation plan**

You, or the person who logged the concern on your behalf, will be notified when the investigation is complete

## How are confidentiality and privacy maintained?

Maintaining confidentiality throughout the process is essential for protecting the integrity of the investigation and identity of all parties involved. Confidentiality is extended to the person who raised the concerns, as well as to all other parties involved in the investigation (e.g., witnesses, subject). This means information is shared with a limited number of people on a strict-need-to-know basis.

We are committed to protecting the privacy of everyone involved in the investigation process. Personal data will be processed in accordance with the [Johnson Controls Privacy Notice](#) and the [Johnson Controls Employee Privacy Notice](#).

### Scenario

**I was interviewed as part of an internal investigation. My supervisor asked me to tell him what the interview was about. What should I tell him?**

Maintaining the confidentiality of an investigation is the responsibility of all parties involved. You are not required to disclose any information to your supervisor or anyone else. If you need further guidance, contact the investigator or [AskCompliance@jci.com](mailto:AskCompliance@jci.com) for support.

## What is our Non-retaliation Policy?

Retaliation occurs when adverse action is taken against someone for reporting a concern in good faith or cooperating with an investigation.

Johnson Controls prohibits retaliation. It goes against our values and undermines the trust that is essential to our success.

Retaliation can take several forms, including

1. Creation of a hostile or intimidating work environment;
2. Isolation or exclusion by colleagues;
3. Reduction of hours, demotion, suspension, termination, or any other adverse employment action;
4. Denial of promotion, pay increase, or employment benefits; or
5. Any other negative consequence.

Any retaliation concerns must be promptly reported into the [Integrity Helpline](#).

This policy does not protect a reporter from the consequences of his or her own misconduct. This policy also does not prevent the management of performance issues that are not connected with the reporting of a concern.

### What is reporting in good faith?

Reporting in good faith means reporting a concern with a reasonable belief that it is true. It does not matter whether the concern is substantiated or not upon investigation.

## What are the obligations of employees, managers, and leaders under this Policy?

### Employees must

- i. Promptly report violations of the [Johnson Controls Code of Ethics](#), Company policy, or the law
- ii. Cooperate fully and transparently with internal investigations
- iii. Never knowingly provide false or misleading information in connection with a concern or investigation
- iv. Never retaliate

### Managers and leaders must

- i. Encourage an open environment where employees feel comfortable speaking up
- ii. Listen patiently and respectfully to concerns that are reported to them
- iii. Keep concerns confidential
- iv. Promptly report all concerns shown in Figure 1, above, into the [Integrity Helpline](#) or raise the concern to a member of Human Resources, Compliance, or Legal to be reported
- v. Not conduct independent investigations by themselves or instruct someone to investigate.
- vi. Ensure no retaliation takes place
- vii. Timely identify and implement appropriate remediation actions following the conclusion of an investigation

## What happens if I violate this Policy?

Any employee who violates this Policy may face disciplinary action up to and including termination of employment.



## Useful links

- [Johnson Controls Code of Ethics](#)
- [Johnson Controls Integrity Helpline](#)
- [Integrity Champions Global Program](#)
- [Country Specific Whistleblowing Policies](#)
- [Johnson Controls Disciplinary Guidelines](#)
- [Johnson Controls Privacy Notice](#)
- [Johnson Controls Employee Privacy Notice](#)
- [Global Privacy Office](#)
- [Employee Topic - Employee Center \(service-now.com\)](#)
- [HR Knowledge - USA - Equal Employment Opportunity and Affirmative Action Policy \(service-now.com\)](#)
- [HR Knowledge - USA - JCI's Harassment Free Workplace Policy \(service-now.com\)](#)
- [HR Knowledge - ZAF - Harassment Policy \(service-now.com\)](#)
- [HR Knowledge - PRI - Anti-Harassment Policy \(service-now.com\)](#)
- [HR Knowledge - COL - Harassment Prevention Policy \(service-now.com\)](#)
- [HR Knowledge - CAN - No Harassment Policy \(service-now.com\)](#)
- [HR Knowledge - IND - POSH Policy \(service-now.com\)](#)



Dates		Subject
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Department	Department Contact	Approved
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